

AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

☐ Original ☐ Duplicate Original

LODGED
CLERK, U.S. DISTRICT COURT
2/25/2025
CENTRAL DISTRICT OF CALIFORNIA
BY: _____ ASI _____ DEPUTY

UNITED STATES DISTRICT COURT

for the

Central District of California

FILED
CLERK, U.S. DISTRICT COURT
02/25/2025
CENTRAL DISTRICT OF CALIFORNIA
BY: _____ IV _____ DEPUTY

United States of America

v.

MAKSIM ZAITSEV,

Defendant

Case No. 2:25-mj-00993-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about February 25, 2025, in the County of Los Angeles in the Central District of California, the defendant violated:

Code Section

18 U.S.C. § 111(a), (b)

Offense Description

Assault of a Federal Employee Resulting in Bodily Injury

This criminal complaint is based on these facts:

Please see attached affidavit.

/s/ Kori Leopoldo

Complainant's signature

Kori Leopoldo, Inspector, Federal Protective
Service

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 2/25/2025

Patricia Donahue

Judge's signature

City and state: Los Angeles, California

Hon. Patricia Donahue, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Kori Leopoldo, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against MAKSIM ZAITSEV ("ZAITSEV"), charging him with violating Title 18, United States Code, Section 111(a), (b): Assault of a Federal Employee Resulting in Bodily Injury.

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only.

II. BACKGROUND OF INSPECTOR KORI LEOPOLDO

3. I am an Inspector with the United States Department of Homeland Security, Federal Protective Service ("FPS"). I have been in this position since September 2022. As part of my official duties as an Inspector, I investigate crimes against the United States that originate on United States government property, including assaults against federal employees and contractors.

4. I have completed one basic training course at the Federal Law Enforcement Training Center in Glynco, Georgia, which included training in constitutional law. I also completed two advanced training courses which included advanced interviewing techniques and investigative analysis. Prior to becoming a FPS uniformed law enforcement officer, I worked as a Police Officer with the Department of Defense Marine Corps Civilian Law Enforcement Program for six years where I conducted preliminary investigations of various crimes including assaults on federal employees and contractors.

III. SUMMARY OF PROBABLE CAUSE

5. On the morning of February 25, 2025, Department of Homeland Security ("DHS"), Immigration and Customs Enforcement ("ICE"), Deportation Officers ("DO") I.R. and F.H., were on duty and working at the United States Federal Building located at 300 N. Los Angeles Street in Los Angeles, California. After announcing themselves as ICE agents, DOs I.R. and F.H. detained ZAITSEV pursuant to an administrative arrest warrant. As DOs I.R. and F.H. were escorting ZAITSEV to a processing area, ZAITSEV struggled and bit DO I.R.'s left pinky finger, breaking skin, drawing blood, and resulting in a fracture.

IV. STATEMENT OF PROBABLE CAUSE

6. Based on my review of law enforcement reports and documents, conversations with other law enforcement officers, and my own knowledge of the investigation, I am aware of the following:

7. On or about February 19, 2025, ICE issued a G-56 letter requesting ZAITSEV to appear on February 25, 2025, for a case review at the ICE office inside the United States Federal Building located at 300 N. Los Angeles Street in Los Angeles, California.

8. Based on my conversations with other law enforcement agents, I understand that, on February 25, 2025, at approximately 9:50 a.m., DOs I.R. and F.H. arrested ZAITSEV pursuant to an administrative arrest warrant issued by DHS. DOs I.R. and F.H. announced themselves as ICE agents before arresting ZAITSEV.

9. After handcuffing ZAITSEV, DOs I.R. and F.H. attempted to escort ZAITSEV to processing. While walking ZAITSEV through a hallway, ZAITSEV became agitated. ZAITSEV screamed towards an individual the DOs believed to be his wife and dropped his weight. ZAITSEV and DOs I.R. and F.H. lost their balance and fell to the ground. While DOs I.R. and F.H. attempted to regain control of ZAITSEV, ZAITSEV bit DO I.R. on the left pinky finger. The bite broke skin and drew blood.

10. Based on my conversations with law enforcement and review of documents, I understand that DO I.R.'s finger was fractured as a result of the bite. Photographs of DO I.R.'s injuries are below:



11. It is my understanding that deportation officers are considered officers and/or employees of the United States due to their employment with the United States Department of Homeland Security. Furthermore, it is my understanding that DO I.R. was engaged in his official duties while taking defendant into custody as described above.

V. CONCLUSION

12. For all the reasons described above, there is probable cause to believe that ZAITSEV has committed a violation of Title 18, United States Code, Section 111(a), (b): Assault on Federal Employee Resulting in Bodily Injury.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 25th day of February 2025.

Patricia Donahue

HON. PATRICIA DONAHUE
UNITED STATES MAGISTRATE JUDGE